

April 3, 2002

Secretary Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

**RE: Schools and Libraries Universal Service Support Mechanism (CC Docket No. 02-6)**

Dear Secretary:

On behalf of the St. Louis Public Library, I would like to express my support for the principles put forth by the American Library Association, filing in this matter on the same date. ALA has thoughtfully presented and supported positions that are in accordance with the needs of the library users of St. Louis, Missouri.

Additionally I would like to express the concern of the St. Louis Public Library over an idea contemplated in paragraphs 41 through 47 of the NPRM discussing the use of excess services. The FCC recently granted the State of Alaska a limited waiver of 47 C.F.R. § 54.504(b)(2)(ii), which requires that discounted services be used solely for educational purposes. The NPRM seeks comment on expanding this practice, so long as the services are used for educational purposes in the first instance.

St. Louis Public Library supports the Commission's decision to grant Alaska a limited waiver. But we do not believe that extending the policy is necessary or desirable. The *Alaska Petition* is an isolated example that is not likely to be replicated. The St. Louis Public Library and its users do not support expanding this practice because it may encourage attempts to obtain discounts by entities that are not primarily engaged in educational activities. We believe that communities are appropriately served through their schools and libraries both by the telecommunications made possible through the E-rate and by the necessary infrastructure that these institutions provide. The FCC's existing rules and procedures should be sufficient to allow for future waivers, if they are appropriate.

Thank you for the opportunity to share the St. Louis Public Library's views on issues affecting the E-rate program which has provided valuable resources to our library users and the community we serve.

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